

**Date:** 13<sup>th</sup> December, 2013

**INSPECTOR:**  
Laura Graham BSC MA MRTPI

**PROGRAMME OFFICER:**  
Mrs Claire Jones-Hughes

This letter reflects my initial conclusions on the soundness issues I have identified at this stage in the examination process. I am writing to you now to enable you to consider the best way to address these issues. However, these comments are not intended to be comprehensive, and are made without prejudice to the content of my final report.

## **Housing**

### *Objectively Assessed Need for Housing*

The Framework requires local authorities to assess their full housing needs, including affordable housing. The Housing Duty to Cooperate Study for the Sussex Coast Housing Market Area, May 2013, identifies that an objective assessment of housing need would fall between 16,000 – 20,000 dwellings for the period to 2030. The study notes that the higher end of the range takes account of the shortfall of affordable housing in the City, and includes the provision of 210 dwellings per annum to contribute to reducing the affordable housing backlog.

At the hearings there was a reasonable degree of consensus that the range of 16,000 – 20,000 (as set out in Main Modification MM26) was an accurate reflection of the full, objectively assessed need for housing, although some participants argued that the need could be higher, having regard to the significant need for affordable housing.

Bearing in mind the Framework's requirements that local authorities should assess their **full** housing needs (my emphasis), including affordable housing, my view is that the Plan should indicate that the full objectively assessed need is the higher end of the range, i.e. 20,000 new dwellings.

### *Duty to cooperate.*

I accept that the Council has sought to engage positively with neighbouring authorities in the region. My initial conclusion is that it has met the legal requirement under S.33A of the Act. Unfortunately, the cooperation with neighbouring Councils has not led to a positive outcome, in the sense that none has offered to assist Brighton and Hove by offering

to meet all or part of the objectively assessed needs that cannot be met in Brighton and Hove.

*Housing supply.*

The Plan proposes a target for the provision of new housing of 11,300. This represents only 56.5% of the full objectively assessed need. Even if the lower end of the range were to be used (which for the reasons given above, I do not accept is the correct approach), the target would meet only 70.6% of the need. These figures represent a significant shortfall and substantial weight must be given to the consequent failure to meet the social dimension of sustainable development.

I recognise that there are significant constraints to providing land for development, and that there are competing priorities for any land which may be available. However, given the significant shortfall in meeting housing needs, it is important that the Council rigorously assesses all opportunities to meet that need. It is my preliminary view that the following sources potentially offer an opportunity to increase the target for the provision of new housing.

*Windfall sites.*

The Council should investigate whether or not it would be appropriate to make an allowance for windfall sites, bearing in mind the requirements of paragraph 48 of the Framework.

*Urban Fringe Sites.*

These sites are not subject to nationally recognised designations, which would indicate that development may be restricted. Whilst it may be the Council's aspiration to designate some of these sites as Local Green Space, this is not being pursued through Part 1 of the Local Plan and I have doubts as to whether some of these areas would meet the requirements of paragraph 77 of the Framework. In my letter of 22 July 2013, I commented that the analysis of the urban fringe sites "identifies perceived constraints, but includes no analysis of whether such constraints could be satisfactorily overcome, and what the residual adverse impacts of developing some of the less constrained sites would be". The revised version of TP002a published in September 2013 includes additional commentary on constraints, but does not provide the further analysis that I referred to in my letter. Having now seen some of the sites and had the opportunity to examine more closely the underlying evidence on which this analysis is based, I am not persuaded that the protection from development implied by Policy SA4 is justified in relation to all urban fringe sites. In coming to this conclusion, I have taken account of paragraphs 73 and 74 of the Framework. However, your own analysis concludes that some of these sites do not make a significant contribution to the provision of useable open space, and have limited potential to do so in the future. No consideration appears to have been given to the possibility of allowing development on these sites, which would enable the provision of good quality public open space, as part of a package of

development. Similarly, no consideration appears to have been given to the extent to which other constraints, such as archaeological significance, should prevent development altogether, or whether adequate mitigation would be possible by, for example, careful consideration of design and layout and the imposition of conditions. The site at Toads Hole Valley, which is proposed for development, suffers from some of the same constraints that are said to affect other sites, including its proximity to the National Park. However, the more positive approach taken towards development on this site contrasts with the negative approach taken to other sites. The overall impression given is that the starting point for analysis of these sites has been the desire to resist development, which is at odds with the Framework's requirement that the plan should be positively prepared. The Sustainability Appraisal (SA) makes general observations that the higher housing targets tested would result in significant losses of employment land and open space, but without a more detailed analysis of the sites concerned, I do not consider that great weight can be placed on the conclusions of the SA.

Main modifications MM21 and MM27 indicate that a review of the built up area boundary will be undertaken in Part 2 of the City Plan. However, Document TP/002a seems to pre-judge that exercise by concluding whether or not the sites have any development potential and if so, how many new dwellings may be provided. The expected yield of new dwellings from this analysis is about 100. In view of the significant shortfall in meeting objectively-assessed needs I consider the Council should undertake a more rigorous analysis of the urban fringe sites, along the lines I have already suggested, to determine whether there is greater potential for the delivery of new housing from this source.

#### *Land currently in employment use.*

I recognise that the Plan aims to make appropriate provision for land for employment uses to support the local economy. However, doubts have been raised about the ability of some sites to support the kind of employment and/or mixed-use development envisaged in policy CP3. Bearing in mind the shortfall in land to meet new housing needs, I consider the Council should rigorously reassess whether this policy should be modified to allow for the loss of employment land to housing, where an employment or mixed-use development is not viable. The requirement of the Policy that there should be no net loss in employment floor space may inhibit redevelopment for mixed uses, particularly on sites where viability is marginal.

#### *Five-year land supply*

I note that the Council achieved a good rate of housing delivery from the mid 1990s through to 2007. The lower rate of delivery in recent years is related to poor market conditions. In the circumstances, I consider there is not a record of persistent under delivery and therefore the appropriate buffer, in accordance with the Framework, is 5%. The most common method of calculating a five-year land supply is to use the annualised housing requirement derived from the overall target. I note the Council's

approach is to base its calculations on the housing trajectory, which has the effect of reducing the five-year land supply requirements in the early years of the Plan. The Framework is not prescriptive about the method that should be used to determine the five-year supply of land for housing. However, a method of calculation that suppresses housing land supply in the early years of the plan period does not, in my view, accord with the Framework's general intent to boost significantly the supply of new housing. Such an approach could be justified if essential infrastructure requirements are likely to constrain the delivery of new development, but I am not persuaded that the impact of the economic recession is a valid reason for taking this approach. Once you have addressed the issues relating to the overall target for new homes, you will need to demonstrate that a five year supply of housing land based on an annualised dwelling requirement plus 5% will be available at the time the Plan is adopted.

### *Overall conclusions on housing*

The City Plan Part 1 falls well short of meeting the objectively assessed need for new housing, and although I note the Council's continuing commitment to engage with neighbouring authorities, there is no evidence before me to show that any of the unmet need will be met elsewhere. For the reasons given above I am not persuaded that the City Plan Part 1 meets the requirements of paragraph 14 of the Framework which requires local planning authorities to meet objectively assessed needs, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. I recognise the constraints faced by the Council but if I am to find the Plan sound, notwithstanding such a significant shortfall in the provision of new housing, I would need to be satisfied that the Council had left no stone unturned in seeking to meet as much of this need as possible. Furthermore, depending on the scale of unmet need it may be necessary to reduce the plan period in order that the City Plan can be found sound.

### **Brighton Marina**

I have considered the representations made both orally and in writing regarding the Brighton Marina Act. However, it is not part of my examination to consider whether any planning permissions granted by the Council are lawful. There is no evidence before me that extant planning permissions are being challenged through the Courts, and I have seen nothing to persuade me that these permissions cannot be implemented. Bearing in mind the failure to meet objectively assessed housing needs, and the limited opportunities available to meet that need, it is important that the Marina makes as significant a contribution to the provision of new housing as is reasonably possible. At the hearings there was discussion about the criterion in Policy DA2, which requires development not to breach the cliff height, and there is evidence that this restriction threatens the viability of development at the Marina, and would reduce the amount of housing that could be provided. My attention was drawn to an appeal decision relating to a scheme, which would have breached the cliff height.

The appeal was dismissed because of the inadequacy of the accompanying legal agreement. However, neither the Inspector nor the Secretary of State concluded that the breach of the cliff height was a reason to refuse the scheme. Those conclusions were, of course, specific to that scheme and at the examination hearings the Council expressed the opinion that it was the particular qualities of that scheme that had led to those conclusions. Policy DA2 requires a high quality of building design and includes various safeguards for important environmental assets. There is a statutory duty to pay special attention to the desirability of preserving or enhancing the character and appearance of the Kemp Town Conservation Area. In all the circumstances I consider that the Policy should be modified to remove the cliff height restriction to enable a viable scheme to come forward, which can make a significant contribution to meeting housing needs.

*Brighton Marina Shopping Centre.*

The Council's own evidence does not support the designation of Brighton Marina as a District Centre. That aspect of Policy CP4 is not justified and the Policy should be modified accordingly. The Council's aspiration to improve the shopping centre is included in Policy DA2 and if this is successful, it may be appropriate to designate it as a District Centre when a review of the Plan is undertaken.

**Viability**

The Council's Combined Policy Viability Study, which was unfortunately finalised after the plan was submitted for examination, finds that the combined requirements of the Plan raise serious doubts about the viability of development across the Plan area. The Council seeks to rely on the flexibility clauses in the policies, which it says will enable development to go ahead. It is useful to build in such flexibility to allow for site specific issues to be taken into consideration, but this is not an acceptable substitute for ensuring that the plan facilitates development throughout the economic cycle, as required by the Framework (paragraph 174). I am therefore inviting you to draft modifications to the Plan to ensure that the requirements of the Framework are met in relation to this issue and in accordance with the evidence now available. In particular, you may wish to consider whether the requirements of Policy CP8 can be justified in this context, particularly bearing in mind forthcoming changes to the Building Regulations. Furthermore, the characteristics of the housing stock in Brighton are not dissimilar to those in many established urban areas and I am not convinced that this justifies a local requirement, which is more onerous than the national standards provided by the Building Regulations.

I look forward to receiving your response but it may be of assistance for you to know that I will be working on the Rother Local Plan Examination throughout January 2014.

*Laura Graham*

Inspector



**Brighton & Hove  
City Council**

**Planning & Public Protection**

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Dear Miss Graham,

Thank you for your letter dated 13 December 2013 (ref ID-21) setting out your initial conclusions on the soundness issues with the Brighton & Hove City Plan Part 1.

I would like to take this opportunity to set out the council's response to the concerns you raise in your letter and our views on the way forward. We intend to address all of your comments positively. The council is keen to take the City Plan forward rapidly to adoption and it is a key priority for the city that will help bring major sites forward for development and stimulate economic growth.

### **Housing**

#### **Duty to Cooperate**

The council notes and welcomes your initial conclusion that we have met the legal requirement under S.33A of the Act with regard to duty to cooperate. We will continue to work positively with neighbouring authorities to pursue a positive outcome regarding meeting unmet housing requirements. Examples of progress are that the city council's Economic Development and Culture Committee on 23rd January approved The Coastal West Sussex and Greater Brighton Local Strategic Statement (LSS) along with the memorandum of understanding and terms of reference for the Coastal West Sussex and Greater Brighton Strategic Planning Board. In a separate development the City Council (along with Lewes District Council and the Coast to Capital LEP) have accepted an invitation to join the West Sussex Strategic Planning Board. The LSS has also now been formally agreed by the other seven planning authorities that sit on the Coastal West Sussex Strategic Planning Board. In addition there is ongoing work with the Local Enterprise Partnership and with the Strategic Economic Plan. The council will continue to seek effective mechanisms to deliver housing employment and infrastructure needs through Duty to Cooperate.

#### **Objectively Assessed Need**

The council notes that you consider that the City Plan should indicate that the city's objectively assessed need for housing over the plan period should be the higher end of the estimated range (20,000 dwellings) as put forward in the Housing (Duty to Cooperate) Study for the Sussex Coast Housing Market Area, May 2013 (Core Doc Ref EP/051). We propose to draft Post-Hearing Modifications to the Plan to address this concern.

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## Housing Supply

The council welcomes your recognition of the significant constraints the city faces in meeting its objectively assessed housing needs and the competing pressures and priorities for available land. Your letter suggests three potential sources of land supply which you advise the council to further consider in an attempt to increase housing supply.

**a) Windfall Sites** – the council will investigate whether it would be appropriate to make an additional allowance for housing supply from this source. The housing target in the City Plan already makes an allowance for such sites towards the end of the Plan period and further intensification of the urban area is also anticipated through the council's estate regeneration programme. However, the council will consider whether an additional allowance may be appropriate to cover the whole plan period. Subject to the results of this investigation, we would draft post-hearing modifications to Policy CP1 and Annexe 3 Housing Implementation Strategy accordingly.

**b) Urban Fringe Sites** – in order to address your concerns, the council will undertake a thorough and detailed assessment of land within the city's defined urban fringe. This study will include an analysis of whether identified constraints could be satisfactorily overcome, and what the residual adverse impacts of developing additional urban fringe sites would be.

As a point of clarification, some of the urban fringe sites are subject to nationally recognised designations, for example, RIGS, SSSI and land designated as Ancient Scheduled Monument. In accordance with the NPPF it is considered appropriate that these sites/ parts of site are excluded from the detailed assessment. Can you confirm that you are agreeable to this?

In undertaking this additional work, the council will remain mindful of policies in the Framework that indicate existing open space, sports and recreational buildings and land, including playing fields should not be built on unless surplus to requirements or capable of being replaced by equivalent or better provision in a suitable location.

A timeframe for the completion of this work is set out in detail at the end of this letter for your consideration. The findings of the study will be reflected in the annual update of the Strategic Housing Land Availability Assessment, where urban fringe sites with housing potential will be listed. The housing potential identified will be reflected in a revised housing target and the five year housing supply for the city.

Your comments on this approach would be welcome.

**c) Land Currently in Employment Use** – the council would welcome clarification on this aspect of your letter and the extent of the additional reassessment required. In your letter you state that:

*'Bearing in mind the shortfall in land to meet new housing needs, I consider the Council should rigorously reassess whether this policy should be modified to allow for the loss of*

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*employment land to housing, where an employment or mixed-use development is not viable. The requirement of the Policy that there should be no net loss in employment floor space may inhibit redevelopment for mixed uses, particularly on sites where viability is marginal.'*

Could you clarify and confirm to which parts of the policy CP3 your statement relates? In Matters Statement 5 on Employment the council addresses this specific matter in relation to mixed use development in part 4 of CP3. With respect to CP3.4 it should be noted that two of the five sites listed have recently been granted planning permission for mixed use development where viability evidence submitted by the applicant was assessed and a reduction in employment floorspace allowed to achieve viability. A third site is at pre-application stage. Subject to your clarification the council will draft modifications to CP3.4 to modify the reference to no net loss of employment floorspace.

### **Five Year Supply**

The council welcomes your recognition of the good rate of housing delivery achieved in the city before the economic downturn and that 5 per cent is an appropriate buffer for the 5 year supply.

We note your recommendation that an annualised approach to the calculation of the 5 year supply requirement should be used. It was not the intention of the council's phased or staggered approach to suppress housing land supply but rather to realistically reflect the specific nature of housing development in the city (e.g. a high proportion of flatted development) , and market signals with regard to deliverability in the early years of the plan. These factors are all reflected in the council's housing trajectory. The council also notes that the City Plan must be able to demonstrate an up to date 5 year supply of housing at the time the Plan is adopted to be found sound.

We would welcome further clarification and advice from you on the suggestion that it may be necessary to reduce the plan period to find the plan sound as we have some concerns regarding this point. The City Plan has been prepared in accordance with NPPF guidance (paragraph 157) requiring plans to be drawn up over an appropriate timescale to take account of longer term requirements. City Plan background studies, planned development and infrastructure provision is based upon a 15 year plan. The council is concerned that a shortened plan period could undermine the approach and evidence base informing the City Plan Part 1. Further, given the delays in adopting the City Plan it would seem appropriate to move the start date for the Plan from 2010 to 2014. Your comments on this approach would also be welcome.

### **DA2 Brighton Marina**

The council notes your comments on Brighton Marina in relation to the cliff height restriction and the status of the shopping centre. The council's aspirations are to enhance the choice and performance of retailing at the Marina and to ensure new development is of a high quality of building design, safeguarding important environmental assets as well as preserving/ enhancing the character and appearance of the Kemp Town Conservation Area. We will draft post-hearing modifications in response to your comments.



### **Viability**

You have invited draft modifications to the plan to ensure the Plan facilitates development throughout the economic cycle as required by paragraph 174 of NPPF with particular reference to the sustainable building policy (CP8).

The council is committed to meeting the government's targets to deliver zero carbon homes and maintaining rigorous energy performance targets over the plan period. The council will re-examine the approach to standards in the policy in response to your comments.

### **Sustainability Appraisal**

An Addendum to the submission Sustainability Appraisal will be produced to assess the impacts of the proposed Main Modifications. The council assumes this will not be required to consider alternative housing target options other than that arising from the housing potential identified but would welcome your advice on this matter. Updates to other sections of the SA may take place where considered appropriate.

### **Next Steps**

A broad timetable below is proposed to take the work forward:

<b>Stage</b>	<b>Date</b>
Additional work and Further Studies	End May 2014
Council Decision on Main Modifications	July 2014
Publication and consultation on Main Modifications in response to Inspector's Letter and additional work (including addendum to the submission Sustainability Appraisal)	End July to September 2014
Re-open Hearing	October 2014
Inspector's Final Report	December 2014

The council considers an up to date Plan is critical for future growth and development in the city and is keen to take the plan forward towards adoption as soon as possible. We have indicated that we will be undertaking consultation on main modifications in response to your letter and the additional work undertaken to take place before a re-opened hearing. However we would like to seek your advice on this part of the timetable. You may prefer consultation to take place after a re-opened hearing. We trust that our suggested approach and indicative timetable is acceptable to you, but would of course be happy to explore any concerns or questions that you have, via the Programme Officer.

Yours sincerely



Liz Hobden  
Local Development Team Manager

Brighton & Hove City Council –City Plan: Part 1

**Date:** 13th February, 2014

**INSPECTOR:**  
Laura Graham BSC MA MRTPI

**PROGRAMME OFFICER:**  
Mrs Claire Jones-Hughes

Thank you for your letter dated 31 January 2014 and positive approach to my initial conclusions. My response to the specific questions you raise is as follows:

**Analysis of urban fringe sites**

According to your Urban Fringe Assessment September 2013, it appears that there are a limited number of sites which are subject to national designations such as SSSI or Scheduled Monument, and such designations apply to parts of sites, rather than the whole of identified sites. In the case of sites affected by SSSI/RIGS designation (site 37 is the only one identified in your Assessment) you will need to consider the extent to which development of parts of the site not covered by the designation would have an adverse impact on the notified special interest features, and the extent to which any harm could be adequately mitigated. Similarly, you will need to consider the extent to which development would harm a Scheduled Monument in accordance with paragraph 132 of the Framework.

For the avoidance of any doubt, my initial conclusions should not be interpreted as an indication that all urban fringe sites would be suitable and/or appropriate for development. My main concern is that the decision to protect some sites from development because of their open space/recreational value is not supported by your own assessment of their existing or potential value for such uses.

**Employment policy**

In the light of the significant shortfall in meeting housing needs my concern is that policies for employment land should not seek to protect sites in employment use where there is no reasonable prospect of use or redevelopment for employment purposes. Viability is clearly an important consideration and I note you have sought to address this through proposed modifications MM30 and MM31. At this stage I am content to consider this matter once representations on the modifications have been received.

**Plan period**

What I have in mind is that if, in spite of your best efforts, there remains a very significant shortfall in meeting the objectively assessed housing need it may be necessary to indicate that the Plan will be subject to an early review. So far as the start date for the Plan is concerned, the Framework requires, preferably, a 15 year time horizon. The City Plan Part 1 seeks to provide the overall strategic and spatial vision to 2030. There will still be 15 years of the Plan period left if the City Plan is adopted in 2015. In the circumstances, I do not consider it essential to move the start date forward to 2014 to ensure soundness.

### **Sustainability Appraisal**

You will need to reassure yourselves that the Sustainability Appraisal Addendum complies with legal requirements, as the Council is the competent authority for these purposes when the Plan is adopted, and it would not be appropriate for me to give detailed advice at this stage. However, one of the tasks of the Sustainability Appraisal is to ensure that all reasonable alternatives have been evaluated. It seems to me that the Sustainability Appraisal should properly test the implications of meeting the full objectively assessed need for housing. Such an assessment should also assist the Council in demonstrating whether it has met the test set out at paragraph 14 of the Framework.

### **Timetable**

I have some reservations about the timetable you have set out. The Inspectorate's current Procedural Guidance indicates at paragraph 4.26 that the general expectation is that issues raised on the consultation of draft main modifications will be considered through the written process and further hearing sessions will only be scheduled exceptionally. Until I have seen any representations made on the draft main modifications, I will not be able to come to a clear conclusion on whether further hearing sessions will be necessary. In the event that further hearings are necessary, the timescale you have outlined would not be acceptable to me. I would need additional time to draw up matters and issues for further hearings and to allow participants to submit statements on those matters and issues. Alternatively, if further hearings are not necessary, I would hope to finalise my report at an earlier date, subject to any other commitments I may have. I suggest that you keep Mrs Jones-Hughes informed about your progress and the dates you schedule for consultation on the main modifications, so that contingency arrangements for further hearings can be made.

*Laura Graham*

Inspector

*Letter to Brighton & Hove City Council from the Inspector*

**Date:** 27<sup>th</sup> June, 2014

**INSPECTOR:**  
Laura Graham BSC MA MRTPI

**PROGRAMME OFFICER:**  
Mrs Claire Jones-Hughes

Thank you for providing me with a copy of your proposed modifications and supporting documents. As you will appreciate I have had only a limited time to consider these but, in view of your expected timetable for publishing and consulting on the documents, I thought it would be more useful for me to provide you with some comments at an early stage. In any event, I cannot come to a clear conclusion on whether the modifications would overcome my concerns regarding soundness without taking into account any representations that may be received.

*Housing need and supply.*

I note that the Assessment of Housing Development Needs Study 2014 has revised upwards the objectively assessed need for new housing and that this is reflected in the Proposed modifications.

I also note that the proposed target for the provision of new housing has been increased to 13,230 but I am not yet in a position to draw any conclusions on whether the requirements of paragraph 14 of the Framework and the test that the plan should be positively prepared have been met.

Regarding the five year land supply, it would appear that that there would not be a five year supply at the time at which the Plan would be adopted if the shortfall from the early years of the Plan period is made up within the first five years, which is the preferred approach set out in Planning Practice Guidance. You will need to have a clear justification of why this is not possible if the Plan is to be found sound.

*Brighton Marina*

I have no comments on the proposed modifications relating to Brighton Marina at this time.

*Viability*

I note that you have proposed modifications to Policy CP8. However, there is no evidence as to whether the modifications proposed will mean

that the plan facilitates development throughout the economic cycle. It would be useful to have an update of the Combined Viability Study to demonstrate whether or not this is the case. I must also draw your attention to the findings of the Inspector examining the soundness of the Bath and North East Somerset in relation to the inclusion of requirements relating to the Code for Sustainable Homes. His report is available on that Council's website and paragraphs 259 – 265 are particularly relevant.

Finally, as a general comment, some of the Proposed Modifications may not be needed for soundness, and in those cases they will not appear in the Appendix to my report. However, it is preferable that all the proposed modifications are consulted upon and within the limits prescribed by the Regulations the Council can make modifications, other than those that are strictly necessary for soundness, to the Plan at adoption.

As you know, the Inspectorate's current Procedural Guidance includes a general expectation that issues raised on the consultation of draft main modifications will be considered through the written representations process and further hearing sessions will only be scheduled exceptionally (paragraph 4.26). Once I have read any representations received, I will come to a final view on whether further hearing sessions are necessary in this case.

*Laura Graham*

Inspector

*Letter to Brighton & Hove City Council from the Inspector*

**Date:** 21<sup>st</sup> July, 2014

**INSPECTOR:**  
Laura Graham BSC MA MRTPI

**PROGRAMME OFFICER:**  
Mrs Claire Jones-Hughes

Thank you for your letter dated 17 July 2014.

It is, of course, entirely a matter for your Council to consider whether it wishes to accept main modifications. However, if the Council is unable to agree to carry out public consultation on main modifications at its meeting in October, I might need to conclude that the request made under section 20(7C) has been implicitly withdrawn, as envisaged in paragraph 4.28 of the Inspectorate's Procedural Guidance. In these circumstances I would be unable to find the City Plan Part 1 sound and would expect the Council to withdraw the Plan. Please keep me advised, via Mrs Jones-Hughes, of any further developments, and in particular whether any changes are made to the Schedule of proposed main modifications. You will also wish to bear in mind the issues I raised regarding viability and a five-year supply of land for housing in my letter of 27 June 2014.

I should also reiterate that consultation on proposed main modifications is undertaken without prejudice to my final conclusions.

I have other work commitments in early 2015 and cannot, at present, advise you as to when I will be able to consider the outcome of any consultation that may be undertaken in the autumn.

*Laura Graham*  
Inspector